

## Document Log Item

<b>Addressing</b>	
<b>From</b>	<b>To</b>
Carmen Santos/R9/USEPA/US	cbucklin@dtsc.ca.gov
<b>CC</b>	<b>BCC</b>
	armann.steve@epa.gov
<b>Description</b>	
Form Used: Memo	
<b>Subject</b>	<b>Date/Time</b>
Fw: Re: Pechiney Cast Plating site - PCBS	03/03/2009 06:15 PM
<b># of Attachments</b>	<b>Total Bytes</b>
0	7,702
<b>NPM</b>	<b>Contributor</b>
<b>Processing</b>	
<b>Comments</b>	

Body

### Document Body

Hello, Christine:

I left you a voice message regarding a potential conference call with you and the consultant that has been managing the cleanup at the Pechiney Cast Plating site. I am available for a conference call on March 4 between 9 and 11:00 am or on March 5. I will know tomorrow at what time I could have a conference call with you. A conference call is being coordinated with another site for March 5 and I am waiting for a reply on that. It would help me out if you could tell me what time is good for you on March 5 provided I receive additional PCB related information on the site and what has been accomplished to date.

I take this opportunity to clarify something that you may already know. The federal Toxic Substances Control Act is not delegable to state or local regulatory agencies. TSCA is implemented by USEPA. As long as TSCA PCB regulations apply to a site, PCB cleanup plans need to be reviewed and approved by USEPA and USEPA should be involved in the oversight of TSCA PCB cleanups. Under the self-

implementing provisions of the TSCA PCB regulations at 40 CFR 761.61(a) a party is required to submit a cleanup plan (notification) together with a certification. If USEPA does not approve a PCB cleanup plan within 30 days after receiving the required notification and certification, the cleanup plan is deemed approved and the responsible party can proceed implementation of the cleanup plan. Characterization of PCB contamination is to be conducted under the self implementing PCB cleanup regulations in accordance with Subpart N of the same regulations. Cleanup verification is to be conducted in accordance with the Subpart O requirements.

The PCB regulations also include risk-based disposal approvals under 761.61(c). A party may submit an application under this section of the PCB regulations to cleanup, sample, or dispose of PCBs in a manner different than that required under the self implementing cleanup section of the PCB regulations at 761.61(a).

Finally, I have conducted a brief internet research on Pydrol which is actually spelled Pydraul. This hydraulic fluid does contain PCBs.

I look forward to your reply. Thank you.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
415.972.3360  
fax: 415.947.3533

-----Forwarded by Carmen Santos/R9/USEPA/US on 03/03/2009 04:31PM -----

To: "Christine Bucklin" <cbucklin@dtsc.ca.gov>  
From: Carmen Santos/R9/USEPA/US  
Date: 03/02/2009 04:33PM  
Subject: Re: Pechiney Cast Plating site - PCBS

Greetings, Christine:

Thank you for your message. Please send electronic copies of the information sent to Max Weintraub. I can make a conference call on March 5. I will let you know on March 3 what times I have available. I still need to know the PCB concentration in the oil that was used. Lets assume for now that TSCA applies to the soil cleanup as well as to the disposition of PCB containing concrete. I need more information as I explained earlier to let you know which cleanup options under TSCA is most appropriate for the site. I cannot answer your question with the extremely limited information included in your message.

I look forward to providing assistance on the Pechiney Cast Plating site. Thank you.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
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"Christine Bucklin" ---03/02/2009 04:12:58 PM---Ms. Santos, We spoke on the phone this morning regarding my project in the City of Vernon. I also s

From: "Christine Bucklin" <cbucklin@dtsc.ca.gov>  
To: Carmen Santos/R9/USEPA/US@EPA  
Date: 03/02/2009 04:12 PM  
Subject: Pechiney Cast Plating site - PCBS

Ms. Santos,

We spoke on the phone this morning regarding my project in the City of Vernon. I also spoke with the consultant and she stated that they did briefly work with a Max Weintraub (sp.) from your offices, but that he let them know of the reorganization your groups were going through. They did send him a risk assessment and remedial action plan but they never received any response. She confirmed to me that the site has been operating since the early 30s and that the lubricating oils they utilized in the process of making the aluminum casts is the likely suspect. They do not have any information on the concentration of the PCBs in the oils. However, they know that the name of the oil is 'Pydrol' and that there were varying degrees, such as A, B, C, D etc.... the facility stopped using the oils and is out of business so, we don't know...in any case, leaks are likely ongoing since the facility operated.

PCBs in soil and concrete are characterized at the site. We would like to work with you to determine if the facility needs to have one of the 2 types of approvals that you mentioned. The consultant can make a phone conference on Wednesday if you want to ask more questions, and she can send you the electronic copy of the document.

Please let me know what you think, thanking you in advance,

Christine Bucklin, P.G.  
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